



September 17, 2013

Mr. Ray Gehrig
5110 North Conner Rd.
Janesville WI 53548

KEEP THIS DOCUMENT WITH YOUR PROPERTY RECORDS

SUBJECT: Final Case Closure with Continuing Obligations
Robinson Cleaners – 1819 Milwaukee Street, Janesville, WI
WDNR BRRTS Activity #: 02-54-248342

Dear Mr. Gehrig:

The Department of Natural Resources (DNR) considers the Robinson Cleaners Milwaukee Street site closed, with continuing obligations. No further investigation or remediation is required at this time. However, you and future property owners must comply with the continuing obligations as explained in the conditions of closure in this letter. Please read over this letter closely to ensure that you comply with all conditions and other on-going requirements. Provide this letter and any attachments listed at the end of this letter to anyone who purchases this property from you.

This final closure decision is based on the correspondence and data provided, and is issued under ch. NR 726, Wisconsin Administrative Code. The DNR South Central Regional Closure Committee completed their review of the request for closure on May 3, 2013. The Closure Committee reviews environmental remediation cases for compliance with state laws and standards to maintain consistency in the closure of these cases. A conditional closure letter was issued by the DNR on May 7, 2013, and documentation that the conditions in that letter were met was received on September 13, 2013.

The property includes a building and asphalt parking lot. The building is divided into two separate commercial suites. At the time of the closure request the bigger suite was used for a dry-cleaning operation and the smaller suite was used for a Checks for Cash store. Past dry-cleaning operations caused soil contamination at the north side of the building. Contaminated soil was removed by excavation and was later passively vented. Groundwater quality at the site improved following the soil remediation. A sub-slab depressurization system is in place to prevent vapor intrusion into the building. The conditions of closure and continuing obligations required were based on the property being used for commercial purposes.

Continuing Obligations

The continuing obligations for this site are summarized below. Further details on actions required are found in the section Closure Conditions.

- Residual soil contamination exists that must be properly managed should it be excavated or removed.
- Pavement, an engineered cover or a soil barrier must be maintained over contaminated soil and the DNR must approve any changes to this barrier.
- If a structural impediment that obstructed a complete site investigation or cleanup is removed or modified, additional environmental work must be completed.

- A vapor mitigation system must be operated and maintained, and inspections must be documented.
- Remaining soil contamination could result in vapor intrusion if future construction activities occur. Vapor control technologies will be required for occupied buildings, unless the property owner assesses the potential for vapor intrusion, and the DNR agrees that conditions are protective of the new use.

The following DNR fact sheet, "Continuing Obligations for Environmental Protection", RR-819, was included with this letter, to help explain a property owner's responsibility for continuing obligations on their property. If the fact sheet is lost, you may obtain a copy at <http://dnr.wi.gov/files/PDF/pubs/rr/RR819.pdf>.

GIS Registry

This site will be listed on the Remediation and Redevelopment Program's internet accessible Geographic Information System (GIS) Registry, to provide notice of residual contamination and of any continuing obligations. DNR approval prior to well construction or reconstruction is required for all sites shown on the GIS Registry, in accordance with s. NR 812.09(4) (w), Wis. Adm. Code. This requirement applies to private drinking water wells and high capacity wells. To obtain approval, complete and submit Form 3300-254 to the DNR Drinking and Groundwater program's regional water supply specialist. This form can be obtained on-line at <http://dnr.wi.gov/topic/wells/documents/3300254.pdf> or at the web address listed below for the GIS Registry.

Case information is also on file at the South Central Regional DNR office, at the address in the letterhead. This letter and information that was submitted with your closure request application, including the maintenance plan and figure(s), will be included on the GIS Registry in a PDF attachment. To review the site on the GIS Registry web page, visit the RR Sites Map page at <http://dnrmaps.wi.gov/imf/imf.jsp?site=brrts2>.

Prohibited Activities

Certain activities are prohibited at closed sites because maintenance of a barrier is intended to prevent contact with any remaining contamination. When a barrier is required, the condition of closure requires notification of the DNR before making a change, in order to determine if further action is needed to maintain the protectiveness of the remedy employed. The following activities are prohibited on any portion of the property where pavement, the building foundation, and vapor mitigation are required, as shown on the **attached "Extent of Surface Cover" map and the "Profile Schematic of Sub-Slab Depressurization System" map**, unless prior written approval has been obtained from the DNR:

- removal of the existing barrier;
- replacement with another barrier;
- excavating or grading of the land surface;
- filling on covered or paved areas;
- plowing for agricultural cultivation;
- construction or placement of a building or other structure;
- changing the use or occupancy of the property to a residential exposure setting, which may include certain uses, such as single or multiple family residences, a school, day care, senior center, hospital, or similar residential exposure settings;
- changing the construction of a building that has either a passive or active vapor mitigation system in place.

Closure Conditions

Compliance with the requirements of this letter is a responsibility to which you and any subsequent property owners must adhere. DNR staff will conduct periodic prearranged inspections to ensure that the conditions included in this letter and the attached maintenance plans are met. If these requirements are not followed, the DNR may take enforcement action under s. 292.11, Wis. Stats. to ensure compliance with the specified requirements, limitations or other conditions related to the property.

the structural impediment. If contamination is found at that time, the contamination shall be properly remediated in accordance with applicable statutes and rules.

Vapor Mitigation or Evaluation (s. 292.12 (2), Wis. Stats.)

Vapor intrusion is the movement of vapors coming from volatile chemicals in the soil or groundwater, into buildings where people may breathe air contaminated by the vapors. Vapor mitigation systems are used to interrupt the pathway, thereby reducing or preventing vapors from moving into the building.

Soil vapor beneath the building contains perchloroethene at levels that would pose a long-term risk to human health, if allowed to migrate into an occupied building on the property. The vapor mitigation system, installed on December 28, 2009, must be operated, maintained and inspected in accordance with the **attached "Passive and Active Vapor Mitigation System Maintenance Plan"**. System components must be repaired or replaced immediately upon discovery of a malfunction. Annual inspections and any system repairs must be documented in the inspection log. The inspection log shall be kept up-to-date and on-site. Submit the inspection log to the DNR only upon request.

The integrity of the floor, building, pavement or other impervious cap that exists on the property, shown on the **attached "Extent of Surface Cover" map**, must be maintained in compliance with the **attached "Passive and Active Vapor Mitigation System Maintenance Plan"**. This will help ensure proper functioning of the vapor mitigation system, limiting vapor intrusion to indoor air spaces.

The property owner must notify occupants, and provide the maintenance plan to any occupant that is responsible for continued operation of the vapor mitigation system.

Chlorinated volatile organic compounds remain in soil at the northern portion of the building as shown on the **attached "Post-Remedial Soil Sampling Locations & Analytical Results" map**, at levels that may be of concern for vapor intrusion in the future, depending on construction and occupancy of a building. At this time, there is one building on the property. Therefore, before another building is constructed and/or an existing building is modified, the property owner must notify the DNR. Vapor control technologies are required for construction of occupied buildings unless the property owner assesses the vapor pathway and DNR concurs that conditions at the property are protective of the new use.

Operating Dry Cleaners

In order to remain eligible for future reimbursement of cleanup costs from the Dry Cleaner Environmental Response Fund (DERF), the owner or operator of the dry cleaning facility must implement enhanced pollution prevention measures within 90 days of the date of this letter. These measures are found in Section 292.65 (5) (a) 2, Wis. Statutes, and NR 169.11 (2), Wis Adm. Code. In accordance with Section 292.65 (8) (f), Wis. Stats., the maximum amount of money that DERF can reimburse to any facility is \$500,000. The enhanced pollution prevention measures include:

- all wastes must be managed in accordance with federal and state hazardous waste rules;
- dry cleaning product or wastewater may not be discharged into any sanitary sewers, septic tanks, or any waters of the State;
- a containment structure must entirely surround and be capable of containing any spill or release of a dry cleaning product from a dry cleaning machine or other equipment;
- the floor within any containment structure must be sealed and be impervious to dry cleaning product;
- perchloroethene must be delivered to the dry cleaning facility by means of a closed, direct coupled delivery system.

Please send written notifications in accordance with the following requirements to address in the letterhead, to the attention of Wendy Weihemuller.

Residual Soil Contamination (ch. NR 718, chs. 500 to 536, Wis. Adm. Code or ch. 289, Wis. Stats.)

Soil contamination remains at the northern portion of the building as indicated on the **attached “Post Remedial Soil Sampling Locations & Analytical Results” map**. If soil in the specific locations described above is excavated in the future, the property owner or right-of-way holder at the time of excavation must sample and analyze the excavated soil to determine if contamination remains. If sampling confirms that contamination is present, the property owner or right-of-way holder at the time of excavation will need to determine whether the material is considered solid or hazardous waste and ensure that any storage, treatment or disposal is in compliance with applicable standards and rules. Contaminated soil may be managed in accordance with ch. NR 718, Wis. Adm. Code, with prior DNR approval.

In addition, all current and future owners and occupants of the property and right-of-way holders need to be aware that excavation of the contaminated soil may pose an inhalation or other direct contact hazard and as a result special precautions may need to be taken to prevent a direct contact health threat to humans.

Depending on site-specific conditions, construction over contaminated soils or groundwater may result in vapor migration of contaminants into enclosed structures or migration along newly placed underground utility lines. The potential for vapor inhalation and means of mitigation should be evaluated when planning any future redevelopment, and measures should be taken to ensure the continued protection of public health, safety, welfare and the environment at the site.

Cover or Barrier (s. 292.12 (2) (a), Wis. Stats.)

The pavement, building or other impervious cover that exists in the location shown on the **attached “Extent of Surface Cover” map** shall be maintained in compliance with the **attached “Paved Asphalt/Concrete Foundation Cover Maintenance Plan”** in order to minimize the infiltration of water and prevent additional groundwater contamination that would the groundwater quality standards in ch. NR 140, Wis. Adm. Code, and to prevent direct contact with residual soil contamination that might otherwise pose a threat to human health.

In this case, the building is also considered a structural impediment, and additional investigation and response requirements apply as described in the section titled Structural Impediments.

A cover or barrier for industrial land uses, or certain types of commercial land uses may not be protective if use of the property were to change such that a residential exposure would apply. This may include, but is not limited to single or multiple family residences, a school, day care, senior center, hospital or similar settings. Before using the property for such purposes, you must notify the DNR to determine if additional response actions are warranted.

A request may be made to modify or replace a cover or barrier. The replacement or modified cover or barrier must be protective of the revised use of the property, and must be approved in writing by the DNR prior to implementation.

The **attached “Paved Asphalt/Concrete Foundation Cover Maintenance Plan” and inspection log** are to be kept up-to-date and on-site. Submit the inspection log to the DNR only on request.

Structural Impediments (s. 292.12 (2) (b), Wis. Stats.)

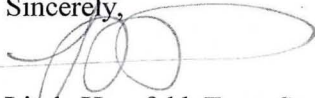
The remaining building shown on the **attached “Post Remedial Soil Sampling Locations & Analytical Results” map** made complete investigation and/or remediation of the soil contamination on this property impracticable. If the structural impediment is to be removed, the property owner shall notify the DNR before removal and conduct an investigation of the degree and extent of volatile organic compound contamination below

In order to retain eligibility, you will need to verify that you have implemented these pollution prevention measures. Additional documentation, such as invoices and photographs of any enhanced pollution prevention measures you implement, can be used to provide verification.

Please be aware that the case may be reopened pursuant to s. NR 726.09, Wis. Adm. Code, if additional information regarding site conditions indicates that contamination on or from the site poses a threat to public health, safety, or welfare or to the environment.

The DNR appreciates your efforts to restore the environment at this site. If you have any questions regarding this closure decision or anything outlined in this letter, please contact Jeff Ackerman at (608) 275-3323.

Sincerely,



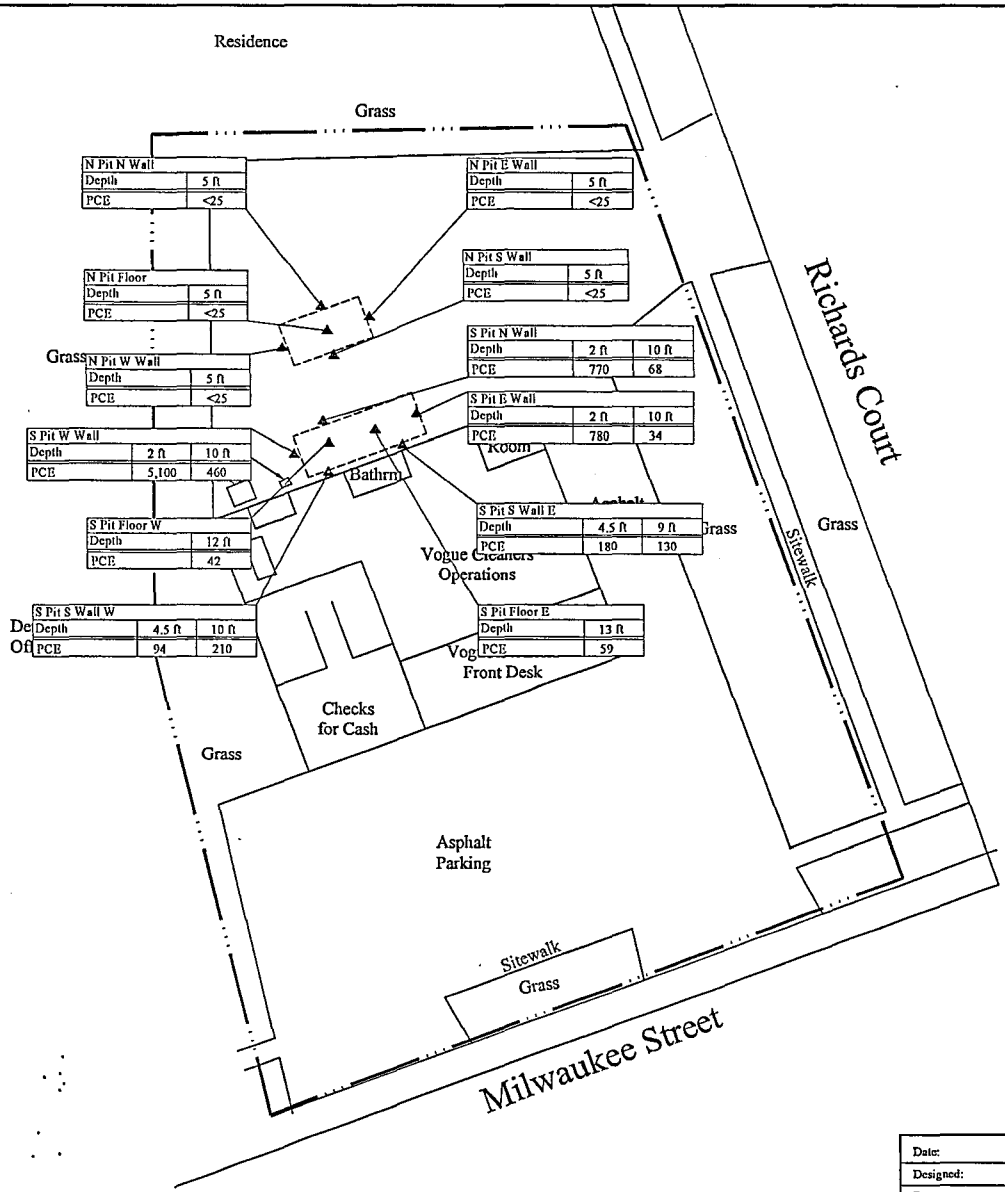
Linda Hanefeld, Team Supervisor
South Central Region Remediation & Redevelopment Program

Attachments:

- Post Remedial Soil Sampling Locations & Analytical Results map
- Extent of Surface Cover map
- Paved Asphalt/Concrete Foundation Cover Maintenance Plan
- Passive and Active Vapor Mitigation System Maintenance Plan
- RR 819

cc: Wayne Fassbender, Enviroforensics

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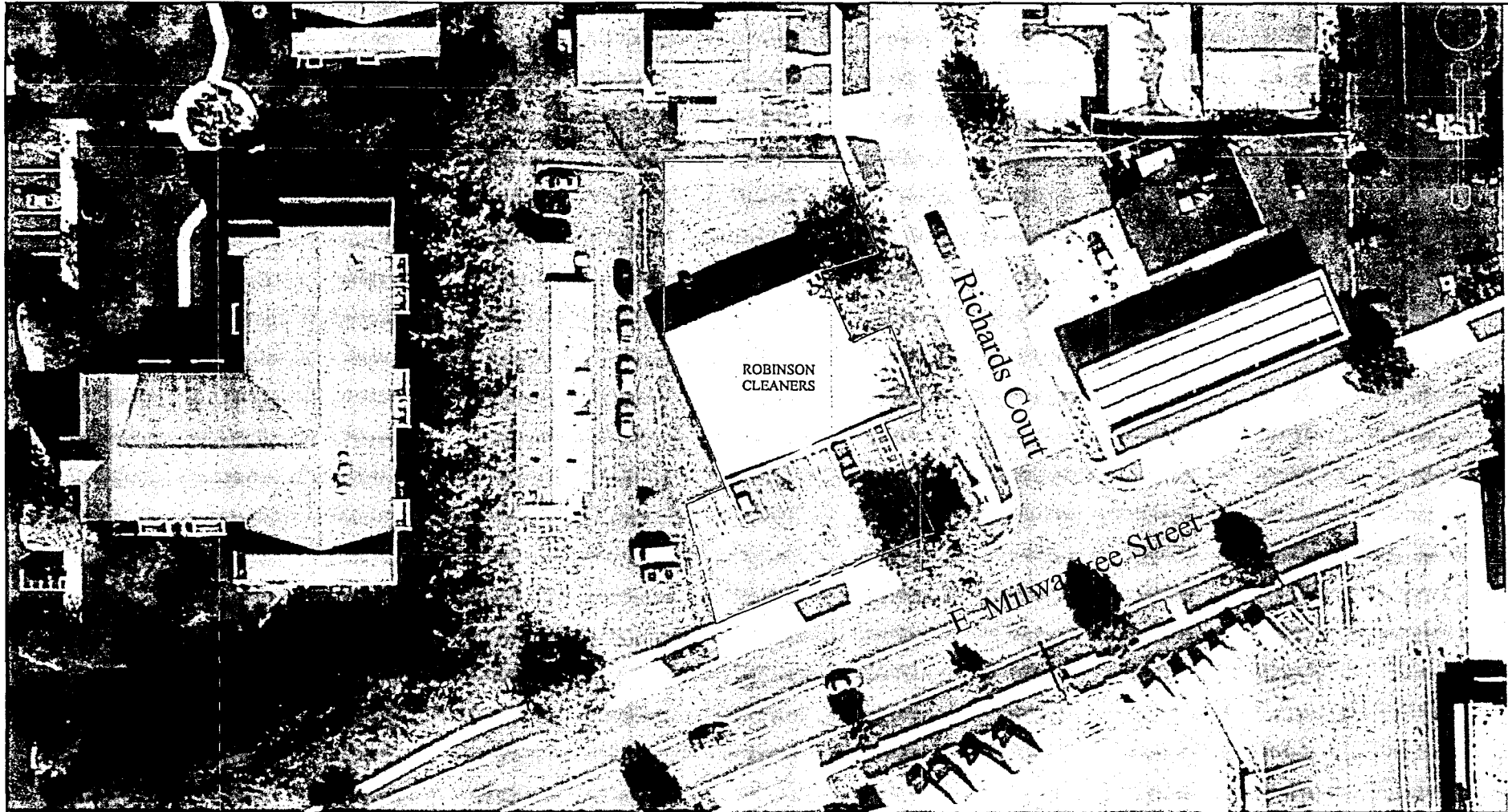


- Legend**
- ▲ Excavation sample location
 - Approximate excavation limits completed in May 2007
 - Property boundary
- Notes:**
- 1.) PCE concentrations reported in ug/kg
 - 2.) ug/kg = micrograms per kilogram
 - 3.) PCE = Tetrachloroethylene

POST REMEDIAL SOIL SAMPLING LOCATIONS & ANALYTICAL RESULTS MAP

Robinson Cleaners
1819 Milwaukee Street
Janesville, WI

Date: 9/4/2012		Figure
Designed: SP		3
Drawn: MMM		Project
Checked: GS	ENVIRONMENTAL FORENSIC INVESTIGATIONS, INC. 602 N. Capitol Ave., Ste. 210 • Indianapolis, IN 46204 EnviroForensics.com	6156
DWG file: 63326-11		



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Not to Scale

EXTENT OF SURFACE COVER

Robinson Cleaners
1819 Milwaukee Street
Janesville, In

Date:	12/4/12
Designed:	SP
Drawn:	MMM
Checked:	NII
DWG file:	63326-11

ENVIROforensics
ENVIRONMENTAL FORENSIC INVESTIGATIONS, INC.
602 N. Capitol Ave., Ste. 210 • Indianapolis, IN 46204
EnviroForensics.com

Figure	1
Project	
6156	



PAVED ASPHALT/CONCRETE FOUNDATION COVER MAINTENANCE PLAN

November 29, 2012

Property located at:

1819 East Milwaukee Street
Janesville, Wisconsin 53545
F ID#:154069850, WDNR BRRTS#:0254248342

BGN AT INTERSECTION NL E MILW.ST & WL RICHARDS CT; TH
NW'LY ALG WL RICHARDS CT 91.45'; TH CONT. NW'LY ALG WL
RICHARDS CT 75.45'; TH S85D33' W 79.88'; TH S3D50"E
100', TH SE'LY TO A PT IN NL E MILW.ST SD PT BEING
133.66' S63D37' W FROM INT NL E.MILW. ST & WL RICHARDS
CT; TH N63D37'E 133.66' TO BGN SE1/4 SEC 30-3-13
JC6310170 SEICHTERB - 5/24/2011 8:36:33 AM
LP: 1817 E MILWAUKEE ST

TAX ID#: 241 0230300106

INTRODUCTION

This document is the Maintenance Plan for the asphalt/concrete building foundation cover for soil at the above-referenced property in accordance with the requirements of s. NR 724.13(2), Wisconsin Administrative Code. The maintenance activities relate to the existing asphalt/concrete building foundation cover in its present condition which occupies the area over the contaminated soil on-site and the sub-slab depressurization system (SSDS) that is installed in the site building.

More site-specific information about this property may be found in:

- The case file in the DNR Waukesha regional office
- BRRTS on the Web (DNR' internet based data of contaminated sites):
<http://dnrmaps.wisconsin.gov/imf/imf.jsp?site=brrts2>; and
- The DNR project manager for Rock County.



DESCRIPTION OF CONTAMINATION

Soil contaminated by tetrachloroethylene (PCE), a common dry-cleaning compound, is located at a depth of approximately 12-14 feet below ground surface (bgs) in the area under the Former Robinson Cleaners facility and directly north of the facility in the parking lot. Groundwater has not been encountered at depths of 20 feet bgs. The extent of soil contamination and the extent of the presently covered area which needs to be maintained to prevent direct contact with the contaminated soil are identified on the attached Figure 1.

DESCRIPTION OF PURPOSE ASPHALT/CONCRETE BUILDING FOUNDATION COVER

The asphalt/concrete building foundation cover located over the contaminated soil, in its present condition, serves as a barrier to prevent direct human contact with residual soil contamination that might otherwise pose a threat to human health. The existing asphalt/concrete building foundation cover, in its present condition will also act as a partial infiltration barrier to minimize future soil-to-groundwater contamination migration that would violate the groundwater standards in ch. NR 140, Wisconsin Administrative Code.

Based on the current and future use of the property, the existing barrier in its present condition should function as intended unless disturbed.

The existing asphalt/concrete building foundation cover, in its present condition, overlying the contaminated soil as depicted in Figure 1 will be inspected once a year, normally in the spring after all snow and ice is gone, for deterioration, cracks and other potential problems that can cause exposure to underlying soils. The existing asphalt surface is partially degraded due to its age and some cracking and pitting are noted. Even in its present state, this asphalt will serve the purpose of acting as a barrier to direct contact with underlying soils and will significantly reduce infiltration of precipitation. The inspections will be performed to evaluate damage due to settling, exposure to the weather, wear from traffic, increasing age, and other factors. Any area where soils have become or are likely to become exposed will be documented. A log of the inspections and any repairs will be maintained by the property owner and is included as Attachment A, Asphalt/Concrete Building Foundation Cover Inspection Log. The log will include recommendations for necessary repair of any areas where underlying soils are exposed. Once repairs are completed, they will be documented in the inspection log. A copy of the inspection log will be kept at the address of the property owner and available for submittal or inspection by the Wisconsin Department of Natural Resources (WDNR) representatives upon their request.

MAINTENANCE ACTIVITIES

If problems are noted during the annual inspections or at any other time during the year, repairs will be scheduled as soon as practical. Repairs can include patching and filling or larger resurfacing or construction operations. In the event that necessary maintenance activities expose



the underlying soil, the owner must inform maintenance workers of the direct contact exposure hazard and provide them with appropriate personal protection equipment (PPE). The owner must also sample any soil excavated from the site prior to disposal to ascertain if contamination is present. The soil must be treated, stored or disposed of by the owner in accordance with applicable local, state and federal law.

In the event the asphalt and or concrete building foundation cover overlying the contaminated soil are removed or replaced, the replacement barrier must be equally impermeable. Any replacement barrier will be subject to the same maintenance and inspection guidelines as outlined in this Maintenance Plan unless indicated otherwise by the WDNR or its successor.

The property owner, in order to maintain the integrity of the asphalt/concrete building foundation cover, will maintain a copy of this Maintenance Plan on-site and make it available to all interested parties (i.e. on-site employees, contractors, future property owners, etc.) for viewing.

PROHIBITION OF ACTIVITIES AND NOTIFICATION

NOTIFICATION WITH THE WDNR MUST BE DONE PRIOR TO ACTIONS AFFECTING THE ASPHALT/CONCRETE BUILDING FOUNDATION COVER

The following activities are prohibited on any portion of the property where an asphalt/concrete building foundation cover is required as depicted on the attached Figure 1, unless prior written approval has been obtained from the WDNR: 1) removal of the existing barrier; 2) replacement with another barrier; 3) excavating or grading of the land surface; 4) filling on capped or paved areas; 5) plowing for agricultural cultivation; or 6) construction or placement of a building or other structure.

AMENDMENT OR WITHDRAWAL OF MAINTENANCE PLAN

This Maintenance Plan can be amended or withdrawn by the property owner and its successors with the written approval of the WDNR.

CONTACT INFORMATION

Site Owner and Operator: Former Robinson's Cleaners
Ray Gehrig
5110 Connor Road
Janesville, WI 53548

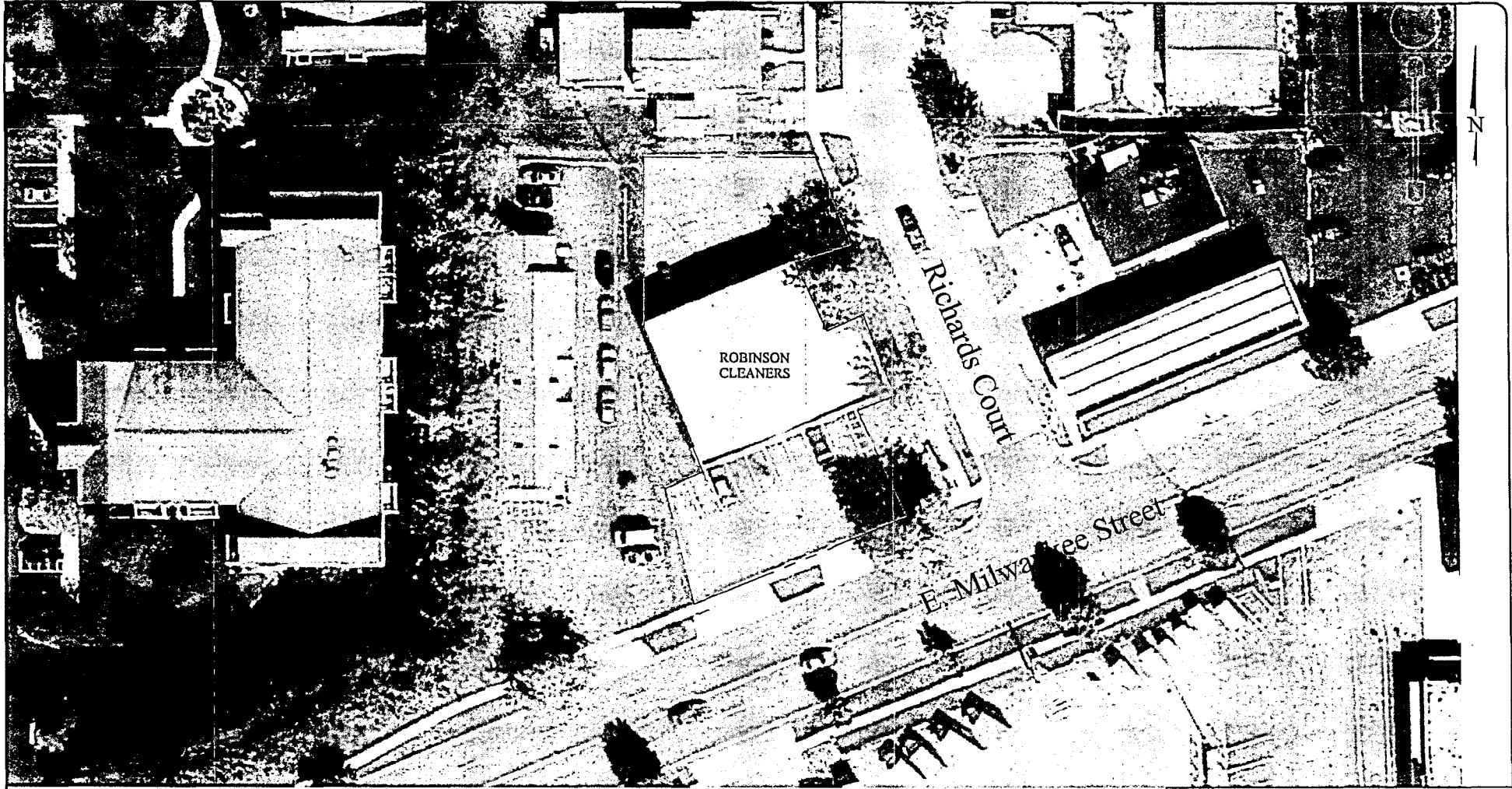
Property Owner: Ray Gehrig Family Trust
Ray Gehrig
5110 Connor Road
Janesville, WI 53548



Consultant: Environmental Forensic Investigations, Inc.
Jeff Carnahan, LPG
602 North Capitol Avenue, Suite 210
Indianapolis, IN 46204
(317) 972-7870

WDNR: Jeff Ackerman
3911 Fish Hatchery Road
Fitchburg, WI 53711
(262) 574-2145

SSDS Maintenance: Acura Services, LLC



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Not to Scale

EXTENT OF SURFACE COVER
 Robinson Cleaners
 1819 Milwaukee Street
 Janesville, In

Date:	12/4/12
Designed:	SP
Drawn:	MMM
Checked:	NH
DWG file:	63326-11

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Figure	1
Project	
6156	

Attachment A
Asphalt/Concrete Building Foundation Cover Inspection Log
Former Robinson's Cleaners
BRRTS# 02-54-248342

Inspection Date	Inspector	Condition of Cap	Recommendations	Has recommended maintenance from previous inspection been implemented?

Note: An annual inspection of the cap is required. The inspection should be conducted after the spring thaw.



PASSIVE AND ACTIVE VAPOR MITIGATION SYSTEM MAINTENANCE PLAN

November 29, 2012

Property located at:

1819 East Milwaukee Street
Janesville, Wisconsin 53545
Facility ID#:154069850, WDNR BRRTS#:0254248342

BGN AT INTERSECTION NL E MILW.ST & WL RICHARDS CT; TH
NW'LY ALG WL RICHARDS CT 91.45'; TH CONT. NW'LY ALG WL
RICHARDS CT 75.45'; TH S85D33' W 79.88'; TH S3D50"E
100', TH SE'LY TO A PT IN NL E MILW.ST SD PT BEING
133.66' S63D37' W FROM INT NL E.MILW. ST & WL RICHARDS
CT; TH N63D37'E 133.66' TO BGN SE1/4 SEC 30-3-13
JC6310170 SEICHTERB - 5/24/2011 8:36:33 AM
LP: 1817 E MILWAUKEE ST

TAX ID#: 241 0230300106

INTRODUCTION

This document is the Maintenance Plan for the passive and active vapor mitigation system (VMS) at the above-referenced property in accordance with the requirements of s. NR 724.13(2), Wisconsin Administrative Code. The maintenance activities relate to the sub-slab depressurization system (SSDS) that is installed in the site building.

More site-specific information about this property may be found in:

- The case file in the DNR Waukesha regional office
- BRRTS on the Web (DNR' internet based data of contaminated sites):
<http://dnrmaps.wisconsin.gov/imf/imf.jsp?site=brrts2>; and
- The DNR project manager for Rock County.



DESCRIPTION OF CONTAMINATION

Soil contaminated by tetrachloroethylene (PCE), a common dry-cleaning compound, is located at a depth of approximately 12-14 feet below ground surface (bgs) in the area under the Former Robinson Cleaners facility and directly north of the facility in the parking lot. Groundwater has not been encountered at depths of less than 20 feet bgs. The VMS to be maintained for the prevention of impacted soil vapors beneath the slab of the building from migrating in to the occupied spaces is identified on the attached Figure 1.

DESCRIPTION AND PURPOSE OF PASSIVE VAPOR MITIGATION SYSTEM

At the conclusion of excavation activities in May 2007, a passive soil vapor venting system was constructed along the northern wall to prevent the migration of COC vapors beneath the Site building. The venting system included a 2-inch perforated pipe installed horizontally at approximately 4.5 ft bgs and extended approximately 30 ft east/west beneath the north wall footer. The pipe elbows to the surface and extends several feet above grade along the building wall. There is no powered fan connected to the piping.

DESCRIPTION AND PURPOSE OF ACTIVE VAPOR MITIGATION SYSTEM

The current building consists of approximately 4,000 square foot (sq ft) which is divided into two (2) separate commercial suites. An active drycleaner service located at 1819 Milwaukee Street operates in the eastern suite and an active business located at 1817 Milwaukee Street is in the western suite. The installation of a sub slab mitigation system in the eastern suite was completed in December 28, 2009. The vapor mitigation system installed at the Site is a sub-slab depressurization system (SSDS) that uses a fan-powered vent and piping to draw vapors from the soil beneath the building's slab, and discharges them to the atmosphere. The sub-slab air pressure is lower than the relative indoor air pressure in this case. The purpose of the SSDS is to prevent impacted soil vapors from entering the indoor air space of the adjacent western suite. Overhead and profile schematics of the soil vapor mitigation system are provided as Figures 1 and 2, respectively.

Three (3) depressurization sumps were installed beneath the concrete slab along the wall separating the suites. Each sump consists of a 24-inch diameter gas collection chamber, or soil vapor sump, with a depth of 2 feet installed below the concrete floor. A hammer drill with a 3.5-inch core bit was used to drill through the concrete floor and the sub-slab materials were excavated with a wet/dry vacuum. Vent piping, consisting of 4-inch diameter poly-vinyl chloride (PVC), was run from the vapor sumps, along the divider wall, and through the western wall to the outside of the building. The pipe was sealed into place in the floor and wall by filling the void space around the pipe with a clear weather resistant expandable epoxy resin material. The vent pipe discharge was positioned approximately 12 feet above the ground surface and extended above the roofline. A RadonAway model GP 301 centrifugal fan was installed inline of the outside vent pipe approximately 10 feet above the ground surface. The fan was wired to an outside kill switch installed to provide for immediate power shut-off in times of emergency or



maintenance. The kill switch is a typical 15 ampere electrical toggle switch, which was placed in a weather-proof outdoor electrical switch box located on the outside wall just next to the fan. The switch was then wired to a 15-amp breaker in the breaker box located in the southeast corner of the utility room. A differential pressure manometer was installed on the middle suction pipe to monitor the system pressure during operation.

MAINTENANCE ACTIVITIES

Both passive and active VMSs will be inspected on a quarterly basis to determine and maintain condition and efficiency. Since the passive VMS does was installed in the subsurface and does not involve a powered fan and a visual inspection of the vent piping outside the building is all that will be required. The SSDS will involve monitoring the vacuum in the differential pressure manometer attached to the piping of the system and checking the negative pressure at the existing sub-slab ports by using a magnehelic gauge, or similar, to confirm that the system is operating efficiently.

In addition, the existing concrete slab of the building foundation, in its present condition, overlying the contaminated soil as depicted in Figure 1 will also be inspected quarterly for deterioration, cracks and other potential problems that can cause exposure to underlying soils and soil vapor. The concrete slab will serve the purpose of acting as a barrier to direct contact with underlying soils and soil vapor and will significantly reduce vapor exposure. The inspections will be performed to evaluate damage due to settling, exposure to wear from traffic, increasing age, and other factors. Any area in the slab where vapor exposure has become apparent or is likely to become exposed will be documented.

A log of the inspections and any repairs will be maintained by the property owner and is included as Attachment A, Operation and Maintenance Field Report. The log will include recommendations for necessary repair of any areas where underlying soil vapors may be exposed. Once repairs are completed, they will be documented in the inspection log. A copy of the inspection log will be kept at the address of the property owner and available for submittal or inspection by the Wisconsin Department of Natural Resources (WDNR) representatives upon their request.

If problems are noted during the quarterly inspections or at any other time during the year, repairs will be scheduled as soon as practical. Repairs can include patching and filling or larger resurfacing or construction operations. In the event that necessary maintenance activities expose the underlying soil, the owner must inform maintenance workers of the direct contact exposure hazard and provide them with appropriate personal protection equipment (PPE).

Any replacement system will be subject to the same maintenance and inspection guidelines as outlined in this Maintenance Plan unless indicated otherwise by the WDNR or its successor.

The property owner, in order to maintain the integrity of the VMS, will maintain a copy of this Maintenance Plan onsite and make it available to all interested parties (i.e. onsite employees, contractors, future property owners, etc.) for viewing.



PROHIBITION OF ACTIVITIES AND NOTIFICATION

NOTIFICATION WITH THE WDNR MUST BE DONE PRIOR TO ACTIONS AFFECTING THE VAPOR MITIGATION SYSTEMS

The following activities are prohibited on any portion of the property where the passive and active VMSs are located as required as depicted on the attached Figure 1, unless prior written approval has been obtained from the WDNR: 1) removal of the existing system; 2) replacement with another system; 3) modifications to the existing system; or 4) construction or placement of a building or other structure.

AMENDMENT OR WITHDRAWAL OF MAINTENANCE PLAN

This Maintenance Plan can be amended or withdrawn by the property owner and its successors with the written approval of the WDNR.

CONTACT INFORMATION

Site Owner and Operator: Former Robinson's Cleaners
Ray Gehrig
W 229 N 2494 Highway F
Waukesha, Wisconsin 53186

Signature: _____

Property Owner: Ray Gehrig Family Trust
Ray Gehrig
5110 Connor Road
Janesville, WI 53548

Signature: _____

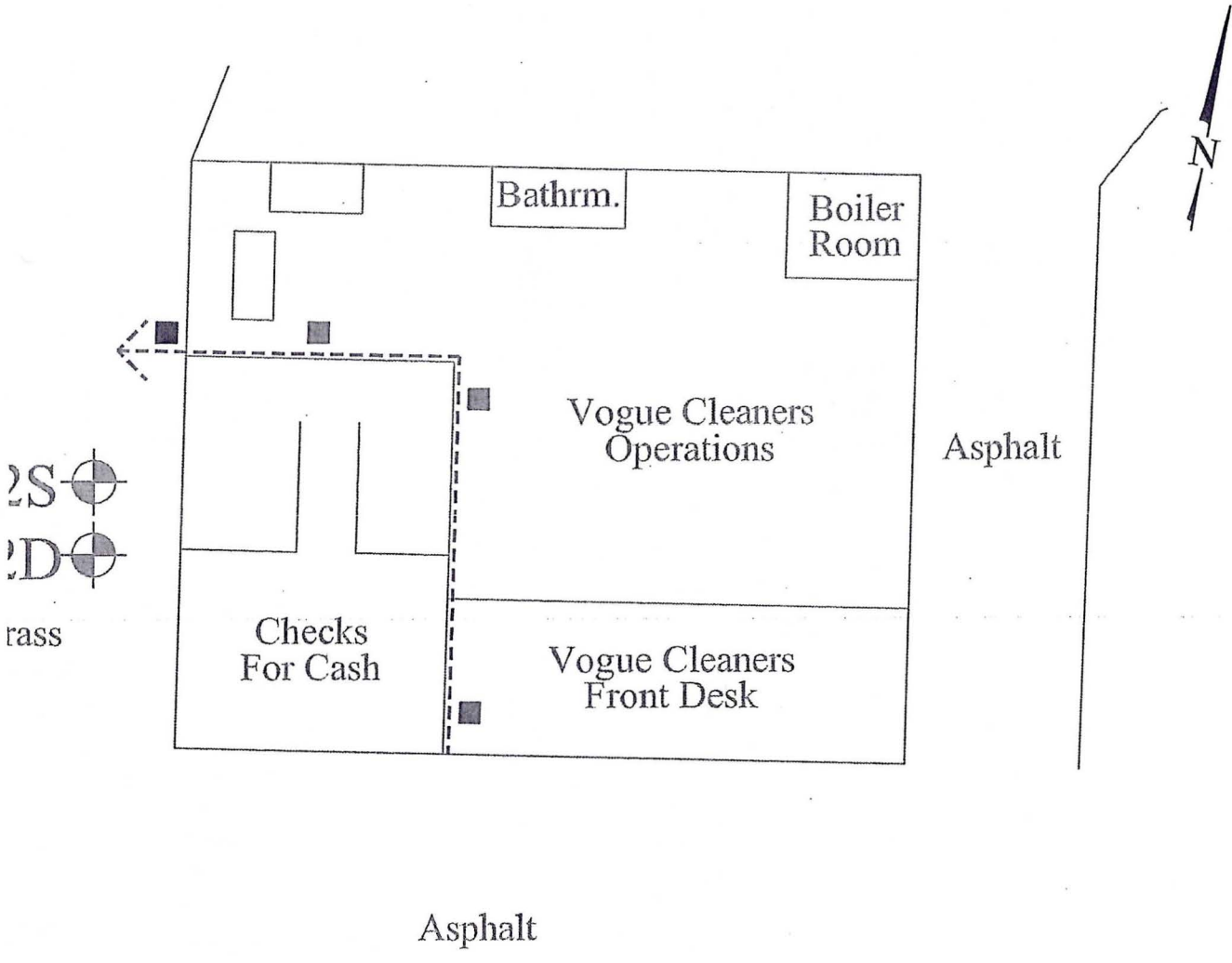
Consultant: Environmental Forensic Investigations, Inc.
Jeff Carnahan, LPG
602 North Capitol Avenue, Suite 210
Indianapolis, IN 46204
(317) 972-7870

WDNR: Jeff Ackerman
3911 Fish Hatchery Road
Fitchburg, WI 53711
(262) 574-2145



SSDS Maintenance:

Accura Services LLC
Anthony G. Hendricks, PE/Owner
105 Chelsea Court
Oregon, WI 53575
(608) 772-2349

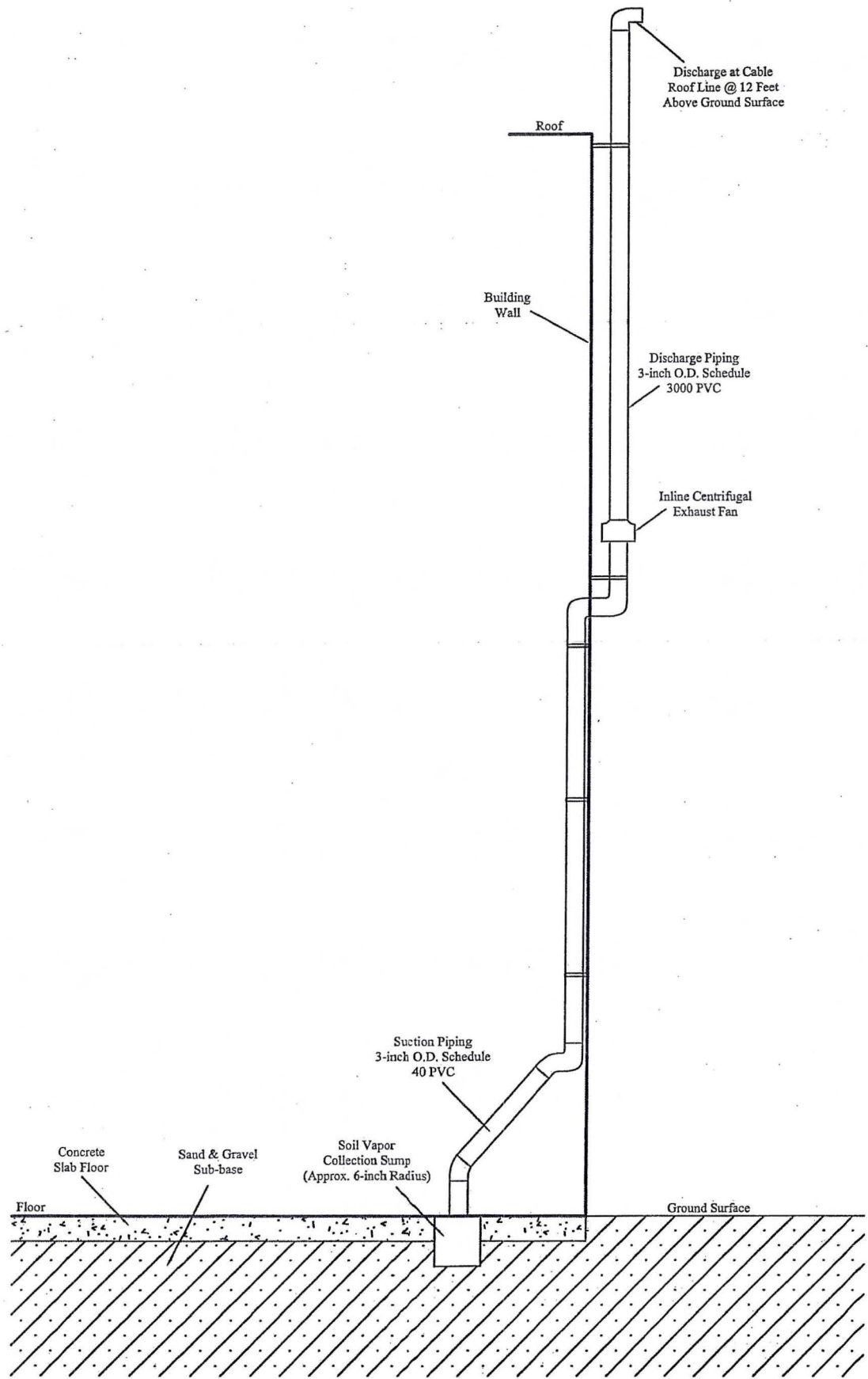


Legend:

- — — 4" Continuous Header
- 2" Depressurization Sump
- Fan Exhaust

Not to Scale

No.	Date	Revision	Approved	ENVIROforensics	Date:	2/1/10	PROFILE SCHEMATIC OF SUB-SLAB DEPRESSURIZATION SYSTEM Robinson Cleaners 1819 Milwaukee Street Janesville, Wisconsin	Figure
				ENVIRONMENTAL FORENSIC INVESTIGATIONS, INC. 602 N. Capitol Ave., Suite 210 • Indianapolis, IN 46204 EnviroForensics.com	Designed:	GZ		1
					Drawn:	HR		Project
					Checked:	GZ		6156
					DWG file:	57772-10		



Not to Scale

No.	Date	Revision	Approved

ENVIROforensics
 ENVIRONMENTAL FORENSIC INVESTIGATIONS, INC.
 602 N. Capitol Ave., Suite 210 • Indianapolis, IN 46204
 EnviroForensics.com

Date:	2/1/10
Designed:	GZ
Drawn:	HR
Checked:	GZ
DWG file:	57702-10

PROFILE SCHEMATIC OF TYPICAL 6" SUB-SLAB DEPRESSURIZATION
 Robinson Cleaners
 1819 Milwaukee Street
 Janesville, Wisconsin

Figure	2
Project	6156



Operation and Maintenance Field Report

Company / Site Info

Project Name: Former Robinsons Cleaners

Date: _____

Address: 1819 Milwaukee Street

Arrival Time: _____

Janesville, Wisconsin

Departure Time: _____

Project Engineer: _____

Site Technician: _____

Commercial - 1819 Milwaukee Street (SSD System)

System Status

	<u>Arrival</u>		<u>Departure</u>		
	Y	N	Y	N	
System Running:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	→ If NO, why _____

Weather (precip., wind, etc.) _____

Outside Temperature (F^o) _____

Inside Temperature (F^o) _____

	Y	N	Comments
Inspect Sub-slab port for vacuum using Magnehelic gauge	<input type="checkbox"/>	<input type="checkbox"/>	_____
Inspect Manometer	<input type="checkbox"/>	<input type="checkbox"/>	_____
Inspect the fan outside	<input type="checkbox"/>	<input type="checkbox"/>	_____
Inspect Overall Integrity of the System	<input type="checkbox"/>	<input type="checkbox"/>	_____

Other Maintenance Performed / Comments / Notes:



Certified Radon Mitigation & Measurement Services

December 29, 2009

Mr. Jeff Carnahan, LPG
Senior Project Manager
Environmental Forensic Investigations, Inc.
1060 N. Capitol Avenue, Suite E230
Indianapolis, IN 46204
Phone 317.972.7870, Fax 317.972.7875, www.enviroforensics.com

Post Mitigation Report For: Vogues Cleaners, 1817 & 1819 Richards Court, Janesville,
Wisconsin

Executive Summary

Acura Services working under the direction of Mr. Jeff Carnahan, Senior Project Manager for Environmental Forensic Investigations, Inc. successfully completed installation of a sub slab mitigation system at Vogues Cleaners in Janesville, Wisconsin on December 28, 2009. Prior to commencing installation Acura Services conducted a vacuum test to determine the design best suited to depressurize the on grade slab and collect the vapors under the slab. Based on the vacuum testing and layout of the building a determination was then made that the most cost effective design would be three pickup points. After the points were installed and the fan checked for operation, follow up testing was done to verify good depressurization under the slab. The follow up testing with fan and installed pickup points demonstrated an increased depressurization of nearly double the depressurization initially demonstrated by the vacuum test. Depressurization was measured near the boiler room (VP-A) at minus 0.042 WC. Depressurization was measured near the restroom (VP-D) at minus 0.104 WC. Based on the strong depressurization measured the mitigation system will capture the vapors under the slab and reroute those vapors outside for final discharge.

Preliminary Information

The system mitigates levels of vapor found under the building slab. The building is a single level on grade slab of approximately 4000 square feet. (Contamination levels and site assessment has been performed by others.)

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Oregon, WI 53575

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The mitigation system is composed of three pickup points of three inch diameter pipe feeding into a four inch header pipe that carries the collected soil gas from the pickup points to the outside of the building. A fan mounted on an upturned elbow provides suction to depressurize under the slab. A u-tube manometer mounted on one pickup point serves as a run indicator.

Vacuum Depressurization Test

On December 21, 2009 I visited Vogue Cleaners to evaluate the planned installation. I performed a vacuum test by drilling a hole near the sample point identified on the drawing as VP-C. I then drilled holes through the concrete to check for depressurization. One sample hole was placed near VP-A and one near VP-D. (Other sample holes were also drilled one toward the front of the cleaners along the wall near where the Cleaners front desk wall and Checks for Cash wall meet. Suction was applied to the point near VP-C. The other holes were checked for depressurization by taking readings with the vacuum off and then readings with the vacuum on. Each point was read at least twice to confirm the accuracy of the first reading. The vacuum test demonstrated that there was very good communication between all points. Point near VP-A (20 feet away near the boiler room) showed a minus .018 inches of WC * after the vacuum was applied. Point near VP-D (17 feet away near the restroom) showed a minus 0.089 inches of WC after the vacuum was applied. All other points checked also demonstrated excellent depressurization.

The test results were discussed with Mr. Jeffrey Carnahan, Senior Project Manager with Environmental Forensics. Based on the positive results from the vacuum test and a review of the layout of the building for routing and hanging the pipe to convey the vapor outside and stay within the cost estimate a decision was made to install three pickup points along the two walls forming Checks For Cash.

Mitigation Installation

On December 23, 2009 the installation of the mitigation was started. Three holes were opened up and excavated to facilitate soil gas collection. The material removed was all granular: a mixture of sand, pebbles, and rocks to fist sized stones. The material was the same for each hole indicating that the whole of the slab probably had the same fill material under it.

After Christmas on December 28, 2009 the mitigation was completed. Four inch pipe was installed as a header connecting the three, three inch pickup points. The header pipe was run outside the building and the fan installed on an upturned elbow. The electrician picked up a leg, set an on/off switch and ran wire through conduit to supply the fan. The discharge was run to above the roof line for final discharge. A stainless steel screen was installed on top of the pipe to prevent varmints or



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birds from dropping anything of size into the pipe. The pickup points were sealed with backer rod and quick setting cement. The u-tube manometer was installed on the middle pickup point. The fan was started up and each pickup point was checked for leakage with a smoke bottle.

Startup Testing

To verify that the system was extending the depressurization zone sub slab pressure readings were made at the two most critical points: the point near VP-A (26 feet away from the nearest pickup point) and the point near VP-D (17 feet away from the nearest pickup point). The point near VP-A demonstrated a change with the fan on of a minus 0.042. The point near VP-D demonstrated a change with the fan on of a minus 0.104.

Conclusion

Based on the measured depressurization following start up of the system the soil gas will be effectively captured under the slab and rerouted for safe discharge outside of the building.
(**Pictures were taken to complement written information.)

Report Prepared by;

Anthony G. Hendricks PE/Owner

*All sub slab pressure readings were made with an Infiltec Digital Micro-Manometer reading in inches of water column.

** Pictures: 1) Material from middle pickup point; 2) Material from pickup point near front of building; 3) Pickup point near front of building; 4) Middle pickup point with installed manometer; 5) Third pickup point nearest where the header pipe exits the building; 6) On/Off Switch for fan above third pickup point; 7) Fan and final discharge outside of building.



Photo 1 – front extraction point below concrete slab

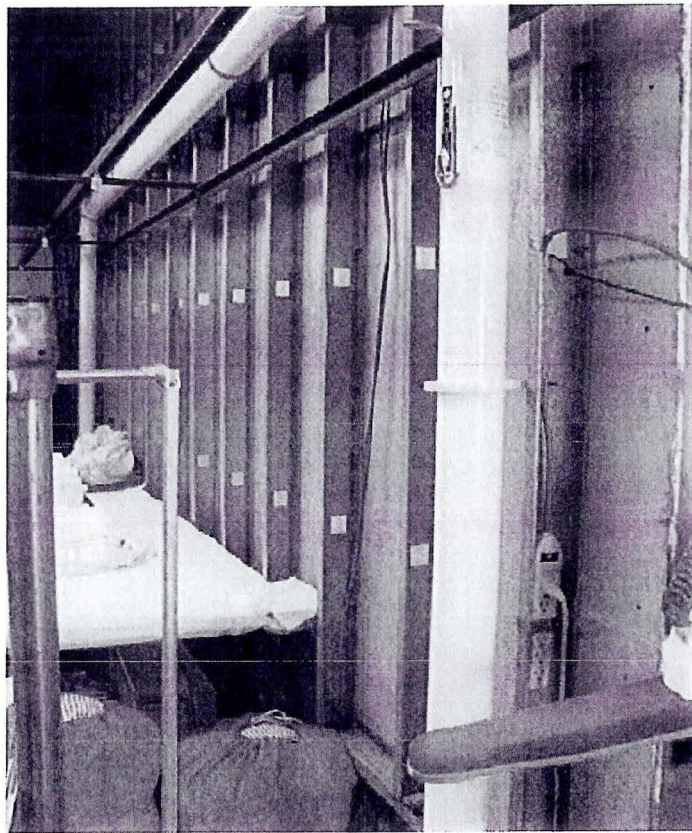


Photo 2 – front and middle extraction points with manometer gauge

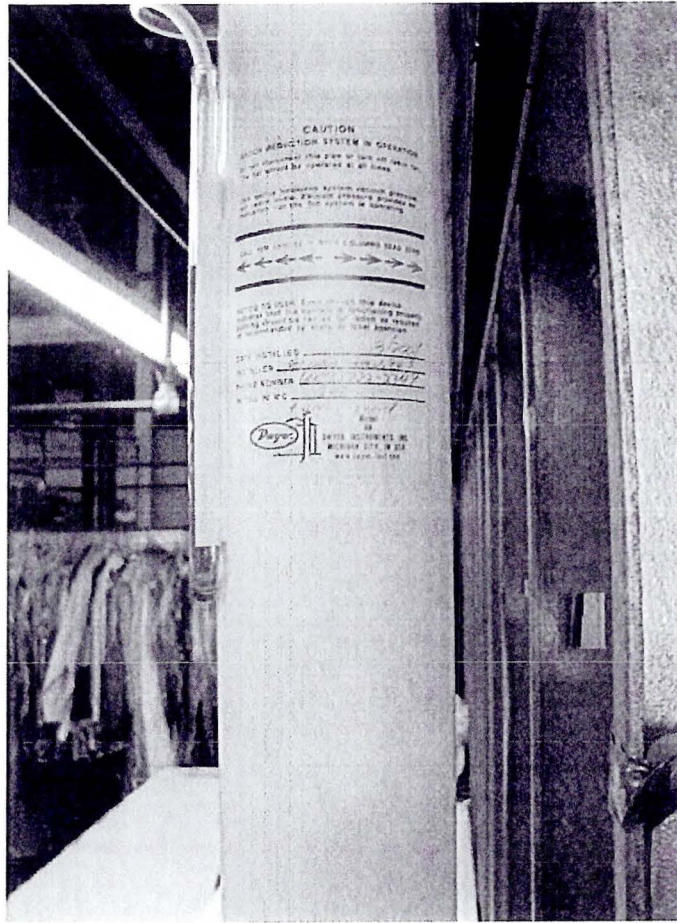


Photo 3 - Mitigation System description on middle extraction point

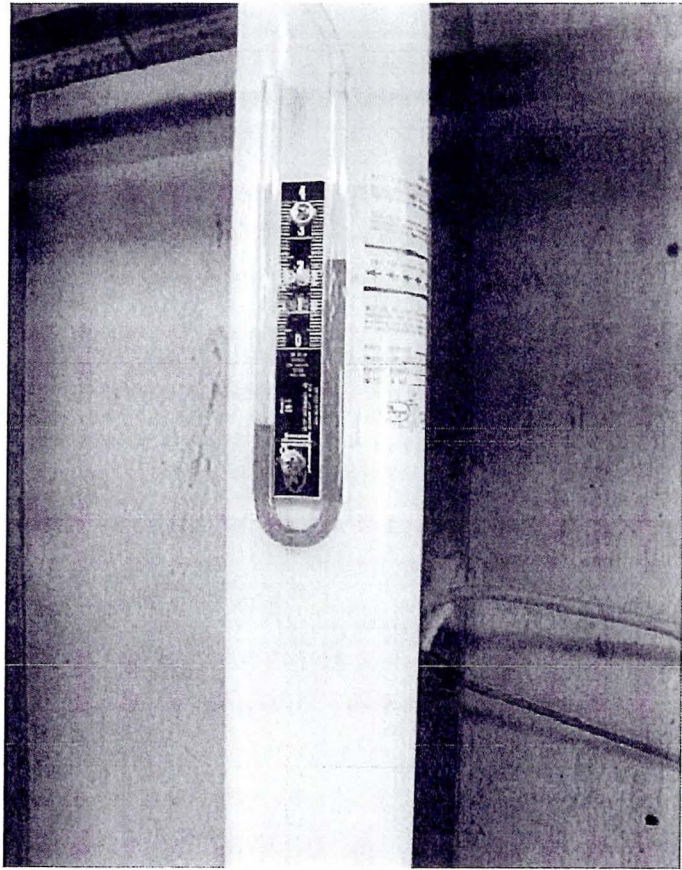


Photo 4 - Manometer on middle extraction point

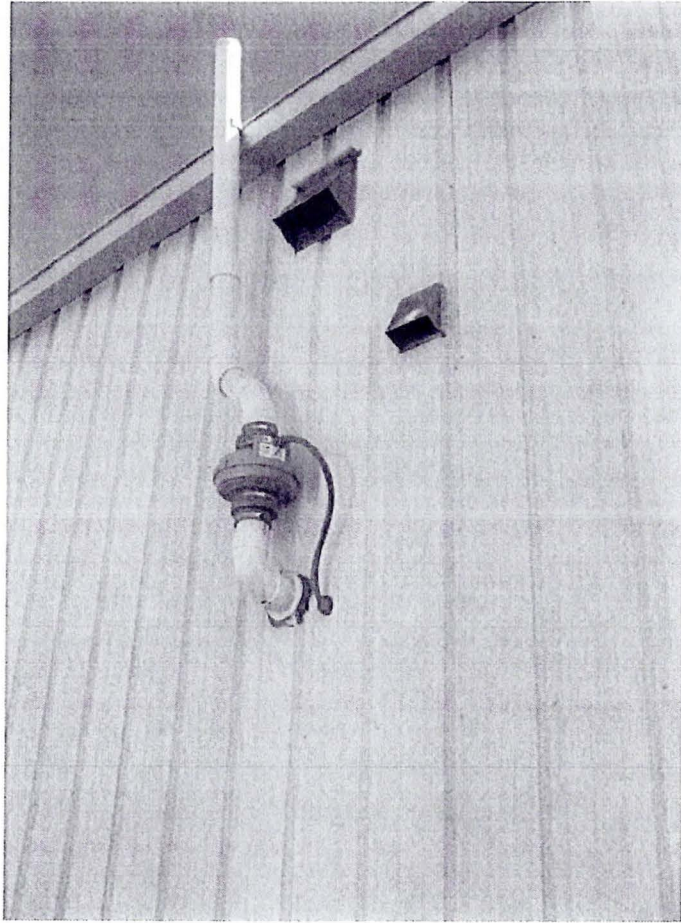


Photo 5 - In-line centrifugal fan and vent pipe



Continuing Obligations for Environmental Protection

Responsibilities of Wisconsin Property Owners

PUB-RR-819

August 2012

This fact sheet is intended to help property owners understand their legal requirements under s. 292.12, Wis. Stats., regarding continuing obligations that arise due to the environmental condition of their property.

The term “continuing obligations” refers to certain actions for which property owners are responsible following a completed environmental cleanup. They are sometimes called environmental land use controls or institutional controls. These legal obligations, such as a requirement to maintain pavement over contaminated soil, are most often found in a cleanup approval letter from the state.

Less commonly, a continuing obligation may apply where a cleanup is not yet completed but a cleanup plan has been approved, or at a property owned by a local government that is exempt from certain cleanup requirements.

What Are Continuing Obligations?

Continuing obligations are legal requirements designed to protect public health and the environment in regard to contamination that remains on a property.

Continuing obligations still apply after a property is sold. Each new owner is responsible for complying with the continuing obligations.

Background

Wisconsin, like most states, allows some contamination to remain after cleanup of soil or groundwater contamination (residual contamination). This minimizes the transportation of contamination and reduces cleanup costs while still ensuring that public health and the environment are protected.

The Department of Natural Resources (DNR), through its Remediation and Redevelopment (RR) Program, places sites or properties with residual contamination on a public database in order to provide notice to interested parties about the residual contamination and any associated continuing obligations. Please see the “Public Information” section on page 3 to learn more about the database. (Prior to June 3, 2006, the state used deed restrictions recorded at county courthouses to establish continuing obligations, and those deed restrictions have also been added into the database.)



Types of Continuing Obligations

1. Manage Contaminated Soil that is Excavated

If the property owner intends to dig up an area with contaminated soil, the owner must ensure that proper soil sampling, followed by appropriate treatment or disposal, takes place. Managing contaminated soil must be done in compliance with state law and is usually done under the guidance of a private environmental professional.

2. Manage Construction of Water Supply Wells

If there is soil or groundwater contamination and the property owner plans to construct or reconstruct a water supply well, the owner must obtain prior DNR approval to ensure that well construction is designed to protect the water supply from contamination.

Other Types of Continuing Obligations

Some continuing obligations are designed specifically for conditions on individual properties. Examples include:

- keeping clean soil and vegetation over contaminated soil;
- keeping an asphalt “cap” over contaminated soil or groundwater;
- maintaining a vapor venting system; and
- notifying the state if a structural impediment (e.g. building) that restricted the cleanup is removed. The owner may then need to conduct additional state-approved environmental work.

It is common for properties with approved cleanups to have continuing obligations because the DNR generally does not require removal of all contamination.

Property owners with the types of continuing obligations described above will find these requirements described in the state’s cleanup approval letter or cleanup plan approval, and *must*:

- comply with these property-specific requirements; and
- obtain the state’s permission before changing portions of the property where these requirements apply.

The requirements apply whether or not the person owned the property at the time that the continuing obligations were placed on the property.

Changing a Continuing Obligation

A property owner has the option to modify a continuing obligation if environmental conditions change. For example, petroleum contamination can degrade over time and property owners may collect new samples showing that residual contamination is gone. They may then request that DNR modify or remove a continuing obligation. A fee is required for DNR’s review of this request (\$500 or \$750, depending on the nature of the request). Fees are subject to change; current fees are found in Chapter NR 749, Wis. Admin. Code, on the web at www.legis.state.wi.us/rsb/code/nr/nr749.pdf.

Public Information

The DNR provides public information about continuing obligations on the Internet. This information helps property owners, purchasers, lessees and lenders understand legal requirements that apply to a property.

Properties with continuing obligations can generally be located in DNR's *GIS Registry*, part of the *RR Sites Map*. The information includes maps, deeds, contaminant data and the state's closure letter. The closure letter states that no additional environmental cleanup is needed for past contamination and includes information on property-specific continuing obligations. If a cleanup has not been completed, the state's approval of the remedial action plan will contain the information about continuing obligations.

However, some older cleanups may not be listed in the *GIS Registry*, so please consult DNR's comprehensive database of contaminated and cleaned up sites, *BRRTS on the Web*. This database shows all contamination activities known to DNR.

BRRTS on the Web and
RR Sites Map are part of
CLEAN
(the Contaminated Lands
Environmental Action Network) at
dnr.wi.gov/topic/Brownfields/clean.html

If a completed cleanup is shown in *BRRTS on the Web* but the site documents can not be found in the *GIS Registry*, DNR's closure letter can still be obtained from a regional office. For assistance, please contact a DNR Environmental Program Associate (see the RR Program's Staff Contact web page at dnr.wi.gov/topic/Brownfields/Contact.html).

Off-Site Contamination: When Continuing Obligations Cross the Property Line

An off-site property owner is someone who owns property that has been affected by contamination that moved through soil, sediment or groundwater from another property. Wisconsin law, s. 292.13, Wis. Stats., provides an exemption from environmental cleanup requirements for owners of "off-site" properties. The DNR will generally not ask off-site property owners to investigate or clean up contamination that came from a different property, as long as the off-site owner allows access to his or her property so that others who are responsible for the contamination may complete the cleanup.

However, off-site property owners are legally obligated to comply with continuing obligations on their property, even though they did not cause the contamination. For example, if the state approved a cleanup where the person responsible for the contamination placed clean soil over contamination on an off-site property, the owner of the off-site property must either keep that soil in place or obtain state approval before disturbing it.

Property owners and others should check the *Public Information* section above if they need to:

- determine whether and where continuing obligations exist on a property;
- review the inspection, maintenance and reporting requirements, and
- contact the DNR regarding changing that portion of the property. The person to contact is the person that approved the closure or remedial action plan.

Option for an Off-Site Liability Exemption Letter

In general, owners of off-site properties have a legal exemption from environmental cleanup requirements. This exemption does not require a state approval letter. Nonetheless, they may request a property-specific liability exemption letter from DNR if they have enough information to show that the source of the contamination is not on their property. This letter may be helpful in real estate transactions. The fee for this letter is \$500 under Chapter NR 749, Wis. Adm. Code. For more information about this option, please see the RR Program's Liability web page at dnr.wi.gov/topic/Brownfields/Liability.html.

Legal Obligations of Off-Site Property Owners

- Allow access so the person cleaning up the contamination may work on the off-site property (unless the off-site owner completes the cleanup independently).
- Comply with any required continuing obligations on the off-site property.

Required Notifications to Off-Site Property Owners

1. The person responsible for cleaning up contamination must notify affected off-site property owners of any proposed continuing obligations on their off-site property **before** asking the DNR to approve the cleanup. This is required by law and allows the off-site owners to provide the DNR with any technical information that may be relevant to the cleanup approval.

When circumstances are appropriate, an off-site neighbor and the person responsible for the cleanup may enter into a "legally enforceable agreement" (i.e. a contract). Under this type of private agreement, the person responsible for the contamination may also take responsibility for maintaining a continuing obligation on an off-site property. This agreement would not automatically transfer to future owners of the off-site property. The state is not a party to the agreement and can not enforce it.

2. If a cleanup proposal that includes off-site continuing obligations is approved, DNR will send a letter to the off-site owners detailing the continuing obligations that are required for their property. Property owners should inform anyone interested in buying their property about maintaining these continuing obligations. For residential property, this would be part of the real estate disclosure obligation.

More Information

For more information, please visit the RR Program's Continuing Obligations web site at dnr.wi.gov/topic/Brownfields/Residual.html.

For more information about DNR's Remediation and Redevelopment Program, see our web site at dnr.wi.gov/org/aw/rr/. This document contains information about certain state statutes and administrative rules but does not include all of the details found in the statutes and rules. Readers should consult the actual language of the statutes and rules to answer specific questions.

The Wisconsin Department of Natural Resources provides equal opportunity in its employment, programs, services, and functions under an Affirmative Action Plan. If you have any questions, please write to Equal Opportunity Office, Department of Interior, Washington, D.C. 20240. This publication is available in alternative format upon request. Please call 608-267-3543 for more information.